

EXHIBIT G

Subject: FW: Leslie Klein Info
Attachments: 1990-04-08 Second Amended Klein Living Trust.pdf; 2012-12-12 Erika Klein Death Certificate.pdf; 2017-01-27 Allianz Letter re Barbara Holtzman.pdf; 2006-01-25 Klein Irrevocable Trust.pdf

From: Marc Lieberman <marc.lieberman@flpllp.com>
Sent: Thursday, March 28, 2024 12:03 PM
To: John W. Lucas <jlucas@pszilaw.com>
Cc: Jeffrey Dulberg <jdulberg@pszilaw.com>; Jeffrey P. Nolan <jnolan@pszilaw.com>
Subject: RE: Leslie Klein Info

John:

The email below responds to you first 12 categories of questions. I'm working on getting documents and responses to your question 13 (regarding Bay Area Development, EKLK, Big Boyz, and Doctors Marketing Group.)

1. Deceased wife's trust agreement (and all amendments). A copy of the 23-page Second Amended Klein Living Trust dated April 8, 1990 ("Klein Living Trust") is attached, along with a copy of Erika Klein's death certificate. The Marital Deduction Trust, which is the irrevocable trust presently in effect, begins at the bottom of page 4. I have requested from Mr. Klein a list of all of the assets that were held in the Trust on the date Erika passed and that are owned by the MTD today.
2. Has your firm received the \$30,000 retainer? If yes, need source of payment and back-up for the same. On March 12, 2024, our firm received by credit card payment the first \$5,000 of the \$30,000. We have yet to receive any other portion of the \$30,000. It has recently been brought to my attention that the credit card confirmation receipt states that the "Account Holder" is Bay Area Development Co ("BADC"). This is troubling to me, because BADC is not Barbara and is scheduled as being owned 100% by Les Klein. I have asked our bookkeeper reverse the charge. It is unclear whether Barbara will replace those funds. Candidly, this may impact our firm's ability to proceed with Les's representation. (Note: Les explains that his schedules are

incorrect in that he only owns 50% of BADC and that the MTD owns the other 50%.)

3. Klein received \$1,250,000 in connection with the Life Capital/Rechnitz settlement in Dec. 2022; where did that money go? Les says that his attorney Jeff Slot received \$1.25M of which he transferred 1.094M to Les, keeping the balance for legal fees. Of that amount, Les paid \$1M to Andrew and Yvette Gardner and paid the \$94,935.30 balance to Andor Gestetner.
 - a. Per the settlement agreement between LCG and Klein, Security Life of Denver was to pay Jeffrey Slott (Mr. Klein's attorney) \$1,250,000 directly. Correct. It appears the payment to Slott occurred because on December 22, 2022, LKA received a wire from Slott in the amount of \$1,094,935.30 with a memo "LIFE CAPITOL GROUP SETTLEMENT". Correct. Is it correct that Mr. Klein is still owed \$500,000 from the LCG settlement Correct and those funds appear to be sitting in a Klein payable account on LCG's books? Les does not know.
4. Documentation regarding the life insurance policies/interest that Les Klein & Associates holds (per deposition testimony). Les believes that he has documentation and is looking for it.
5. Original 2021 tax return; and all schedules and supporting documents. Les states that he has provided a copy of this return, schedules and supporting documents from his accountant Polina Tsikman. Les is in the process of obtaining another copy.
6. Status regarding 2022 and 2023 tax returns; who is preparing it? These returns are being prepared by Polina Tsikman.
7. Klein authorization permitting Trustee to engage wit Google to obtain emails in the various Klein email accounts. Les will not provide this authorization.

8. Identification of all trusts, where Leslie Klein is the trustee, beneficiary, or administrator.

- a. The Barbara O. Holtzman Trust. Ms. Holtzman passed in 2017. The beneficiaries of the trust are (i) the Holtzman Family (\$800,000); EKLK Foundation (50% less \$400,000) and SYPR Foundation (50% less \$400,000). The only asset of the trust was an insurance policy, which paid \$8,011,178.08. The insurance check was paid to "National Society for Hebrew Day School" ("Hebrew Day School") See attached letter from Allianz. Les does not know why the insurance proceeds were not paid to the trust. Les states that \$800,000 of the proceeds of the policy were not paid to the Holtzman family as they should have been. Les further states that the EKLK Foundation has received none of the proceeds. Les believes that Rechnitz or his SYPR Foundation directed the payment of the funds to the Hebrew Day School. Les is the trustee of the EKLK Foundation.
- b. Louis Goodkin Trust. Mr. Goodkin is living. The sole asset of this trust is a \$5 million American General Life insurance policy on Mr. Goodkin's life. The beneficiaries of the Good Trust are (i) the Goodkin Family (10%); (ii) the SYTR Foundation (45%) and (iii) the EKLK Foundation (45%). Les is the Trustee of the EKLK Foundation.
- c. The Agnes Roth Trust. Ms. Roth (92) is living. The sole asset of this trust is a \$6 million insurance policy on Ms. Roth's life. The beneficiaries are the (i) the Agnes Roth children (10%); (ii) the EKLK Foundation (45%) and the STYR Foundation (45%). Les is trustee of the Agnes Roth trust. Les is the trustee of the EKLK Foundation.
- d. The Eugene Kohn Trust. Mr. Kohn passed in 2023. Les is uncertain whether he remains trustee of the Eugene Kohn Trust. The beneficiaries of the Kohn Trust are: the Kohn family (10%); Life Capital

Group LLC (“LCG”) (90%) The members of LCG are: Shlomo Rechnitz (50%); Leslie Klein individually (25%); and Leslies as trustee of the MDT (25%). The sole asset of the Eugene Kohn Trust was an American General life insurance policy. The policy was a \$4 million policy plus return of premiums. The agreement among the LCG members is that they would first receive a preferred return on the premiums they had paid for the policy. Les estimates that Shlomo Rechnitz received the entire amount of the policy proceeds (approx. \$6 million). Of that amount, Les is informed that Shlomo Rechnitz caused Les’s Chapter 11 trustee to be paid \$1.5 million, but Rechnitz has caused nothing to be paid to the Kohn family or the MDT. Les is (for now) trustee of the MTD.

- e. The Judith Frankel Trust. Ms. Frankel, a member of the Menlo family, is deceased. Les is the trustee of the Judith Frankel Trust. The Judith Frankel Trustee is a 1/5 remainder beneficiary of the Sam and Vera Menlo Trust.
- f. Rosie Zimmerman Trust. Rosie Zimmerman is alive. The Rosie Zimmerman Trust is the beneficiary of a \$9 million American General return of premium policy (est. value \$12-\$14 million). Les recalls that LCG (90%) and the Zimmerman family (10%) are the sole beneficiaries of the Kohn Trust. Shlomo Rechnitz (45%); Leslie Klein (22.5%); and the MDT (22.5%) are the members LCG. Les is uncertain whether he remains trustee of the Zimmerman Trust. He is looking into this.
- g. The David Y. Green Trust. Mr. Green died in about 2019. Les is the trustee of Mr. Green’s trust. The David Green Trust formerly owned 50% of 3752 Ocean Blvd, Oxnard, California (“Property”). The Property was sold in 2023 by the Chapter 7 trustee. The David Green Trust has a claim to 50% of the proceeds of that sale. In addition, Leslie Klein individually assigned 20 percentage points (about \$1 million) of his

22.5% beneficial interest in the Eugene Kohn Trust or the Eugene Kohn insurance policy. Les estimates that he is owed fees in excess of \$250,000 for his work in connection with the David Y. Green Trust. Les estimates that the value of assets in the David Y. Green Trust to be about \$2.5 million.

- h. Andrew Friedman Trust. Andrew Friedman is a deceased relative of Les. Les is the trustee. The assets of the trust consist a wrongful death claim that is being litigated an homeowner's insurance policy. Les is presently owed no money from this trust.
- i. The Sam Menlo and Vera Menlo Trusts. Sam and Vera Menlo have passed. Les was the original trustee all of the Menlo Trusts. Les was removed by the probate court as trustee of the Menlo Trusts in April or May of 2023, during the pendency of the instant case. The successor trustees are Frank Menlo and Jeffrey Winter. It is unclear whether or not probate court order is void on account of the instant case. However, Les has not exercised any control of the Menlo Trusts since he was removed by the probate court. Les claims to be owed \$4.2 million in trustee fees for his work for the Menlo Trusts.
- j. The Menlo Grandchildren's Trusts. There a several dozen trusts created by Sam and Vera Menlo for the benefit of their grandchildren. The trusts hold stocks and cash. Les is uncertain whether he remains the trustee of the Menlo Grandchildren's Trusts. Les believes that he is owed trustee fees for his services to the Menlo Grandchildren's Trusts. He is uncertain of the amount.
- k. The Menlo Great-Grandchildren's Trusts. There a several dozen trusts created by Sam and Vera Menlo for the benefit of their grandchildren. The trusts hold stocks and cash. Les is uncertain whether he remains the trustee of the Menlo Grandchildren's

Trusts. Les believes that he is owed trustee fees for his services to the Menlo Great-Grandchildren's Trusts. He is uncertain of the amount.

9. Leslie Klein Life Insurance Irrevocable Trust Dated 06-01-2021 Les does not know what this trust is or whether it exists.
 - a. Trust agreement and all amendments
 - b. Emails and documents exchanged with Yacov Lunger
 - i. How and why is he the trustee of the trust?
 - ii. Is he still the trustee?
 - c. Assets currently or previously owned by this trust.
 - d. Emails and documents exchanged with the Congregation of Zvehil of Monsey
10. The Klein ILIT Dtd 01/25/06 Kenneth Klein Ttee (Irrevocable Life Insurance Trust ("ILIT"))
 - a. Trust agreement and all amendments. A copy of this trust is attached.
 - b. Information relating to Ken Klein as Trustee
 - i. Is he still the trustee? No. Les does not know whether or not the trust has a trustee.
 - c. Assets currently or previously owned by this trust.
 - i. Security Life of Denver Policy # 911627690 (Leslie and Erika Klein) in the amount of \$5,000,000 death benefit. This policy (7690) has lapsed.
 - ii. What happened to these policies #'s 911627691, 911621667, 911627692? Policy 7592 has lapsed. Polices 7691 and 1667 were sold in or about to a hedge fund for \$600,000 each. All of the proceeds were paid to Andor Gestner.

11. Policy and ownership information for the two policies listed on Leslie Klein's bankruptcy Schedule A/B: Property.

- a. Judith Bittman and Isaac Kirzner. Les believes that 50% of these two policies are owned by EKLK Foundation and the other 50% is owned by the MTD. The Bittman death benefit is \$540,000. Ms. Bittman is living. The death benefit on the Kirzner policy is \$750,000. Mr. Kirzner is living. Les has located relevant documents which I will forward once I receive them.
- b. Leslie Klein indicates \$1,000,000 per policy owed to him upon maturity. This is not correct. The EKLK Foundation owns 50% and the MTD owns 50%.
- c. Current trustee is indicated to be Sol. C. Majer. This is correct as to the Bittman Trust. Mr. Majer's address is 327 N. Alta Vista Blvd, Los Angeles, CA 90036. As to the Kirzner Trust, there are two co-trustees. One is Mr. Majer and the other is William Moskowitz, whose address is 364 Martel Ave, Los Angeles, CA 90036.

12. Overseas Bank accounts wherein you are a signatory, owner, or beneficiary. Les states that there are no such accounts.

13. For the following: TBP

- a. Bay Area Development,
- b. EKLK Foundation, and
- c. Big Boyz Legal, LLC
- d. Doctors Marketing Group, LLC (including similar named entities)
 - i. For each of them:
 - ii. Books & Records, including P&L, tax returns, financial statements, and operating agreements (from 2019-present)

- iii. Any Life Insurance policies wherein named as Beneficiary, trustee, or administrator (from 2019-present)
- iv. All bank statements for 2023-2024

From: John W. Lucas [<mailto:jlucas@pszilaw.com>]
Sent: Wednesday, March 20, 2024 2:16 PM
To: Marc Lieberman
Cc: Jeffrey Dulberg; Jeffrey P. Nolan
Subject: RE: Leslie Klein Info

Marc:

Use this list. Your list is missing the items after #12.

Thanks,

John

John W. Lucas
Pachulski Stang Ziehl & Jones LLP
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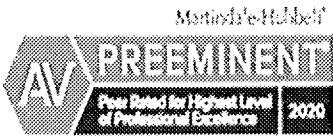
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From: Marc Lieberman <marc.lieberman@flpllp.com>
Sent: Wednesday, March 20, 2024 2:14 PM
To: John W. Lucas <jlucas@pszilaw.com>
Cc: Jeffrey Dulberg <jdulberg@pszilaw.com>; Jeffrey P. Nolan <jnolan@pszilaw.com>
Subject: RE: Leslie Klein Info

Our emails crossed. But thanks!

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State Bar of California
Board of Legal Specialization

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From: John W. Lucas [<mailto:jlucas@pszjlaw.com>]
Sent: Wednesday, March 20, 2024 2:06 PM
To: Marc Lieberman
Cc: Jeffrey Dulberg; Jeffrey P. Nolan; John W. Lucas
Subject: RE: Leslie Klein Info

Marc:

Here you go:

1. Deceased wife's trust agreement (and all amendments).
2. Has your firm received the \$30,000 retainer? If yes, need source of payment and back-up for the same.
3. Klein received \$1,250,000 in connection with the Life Capital/Rectnitz settlement in Dec. 2022; where did that money go?
 - a. Per the settlement agreement between LCG and Klein, Security Life of Denver was to pay Jeffrey Slott (Mr. Klein's attorney) \$1,250,000 directly. It appears the payment to Slott occurred because on December 22, 2022, LKA received a wire from Slott in the amount of \$1,094,935.30 with a memo "LIFE CAPITOL GROUP SETTLEMENT". Is it correct that Mr. Klein is still owed \$500,000 from the LCG settlement and those funds appear to be sitting in a Klein payable account on LCG's books?
4. Documentation regarding the life insurance policies/interest that Les Klein & Associates holds (per deposition testimony).
5. Original 2021 tax return; and all schedules and supporting documents.
6. Status regarding 2022 and 2023 tax returns; who is preparing it?

7. Klein authorization permitting Trustee to engage wit Google to obtain emails in the various Klein email accounts
8. Identification of all trusts, where Leslie Klein is the trustee, beneficiary, or administrator.
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 - a. Judith Bittman and Isaac Kirzner
 - b. Leslie Klein indicates \$1,000,000 per policy owed to him upon maturity.
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John W. Lucas

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From: Marc Lieberman <marc.lieberman@flpllp.com>

Sent: Wednesday, March 20, 2024 1:57 PM

To: John W. Lucas <jlucas@pszjlaw.com>

Cc: Jeffrey Dulberg <jdulberg@pszjlaw.com>; Jeffrey P. Nolan <jnolan@pszjlaw.com>

Subject: RE: Leslie Klein Info

Thank you John. I will forward promptly your email below to Les, begin obtaining copies of documents and information and forward them to you as I receive them. (Next time, kindly use numbers and/or letters rather than bullet points for long list. It makes it easier to communicate with the client and to reference in responsive emails.)

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From: John W. Lucas [mailto:jlucas@pszjlaw.com]

Sent: Wednesday, March 20, 2024 1:48 PM

To: Marc Lieberman

Cc: Jeffrey Dulberg; Jeffrey P. Nolan; John W. Lucas

Subject: Leslie Klein Info

Marc:

Per our discussion last week, here is a list of questions that the Trustee currently has for Mr. Klein. Please note that this is not an exhaustive list. In our prior attempts to acquire information from Mr. Klein, we received vague answers or non-answers via email. The Trustee needs documentation that supports Mr. Klein's responses. For example, Mr. Klein contends that he only holds a 50% interest in the June St. home. The Trustee needs to see the trust agreement (or any other relevant document) that disposed of Mr. Klein's former spouse's interest in the home.

Also, please do not wait until you collect all of the information. Please send responses on a rolling basis.

And, of course, if you have questions or would like to discuss timing or the responses, please let us know and we will set up a zoom.

Thank you,

John

14. Deceased wife's trust agreement (and all amendments).
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